

BEFORE THE

**Federal Communications Commission**

WASHINGTON, D.C. 20554

In the Matter of )

Procedures to Govern the Use of Satellite Earth )

Stations on Board Vessels in 5925-6425 )

MHz/3700-4200 MHz Bands and 14.0-14.5 )

GHz/11.7-12.2 GHz Bands )

)  
)  
)  
)  
)  
)  
)

IB Docket No. 02-10

**RECEIVED**

FEB 25 2004

To: The Commission

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY**REQUEST FOR EXTENSION OF TIME**

Maritime Telecommunications Network, Inc. ("MTN"), by its attorneys and pursuant to Section 1.46 of the Commission's rules, 47 C.F.R. § 1.46, hereby requests that the Commission extend the time in which to file reply comments in the above-captioned Notice of Proposed Rulemaking ("NPRM"). MTN specifically requests a 15-day extension of time, through and including March 24, 2004.

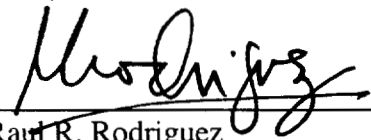
Granting MTN's extension request is appropriate given the complexity of the issues at stake, the number of commenting parties, and past Commission practice. The instant proceeding involves a myriad of regulatory and technical matters concerning the licensing of satellite earth stations on board vessels ("ESVs"). At least 16 parties, including MTN, filed comments addressing these complex issues by the filing deadline of February 23, 2004. Reply comments currently are due to be filed by March 9, 2004, which provides MTN and other interested parties with only 15 days to review the comments and to prepare complete and meaningful replies to the points raised therein.

MTN believes that 15 days is an inadequate amount of time to formulate replies, and Commission precedent supports that position. Earlier in this proceeding, the Commission provided a full 30-day period in which to file reply comments in the Notice of Inquiry ("NOI") concerning ESVs. Because the issues raised in the NPRM are at least as intricate as those raised in the NOI, and in light of the fact that more comments were filed in response to the NPRM than in response to the NOI, MTN maintains that a 30-day reply comment period is appropriate here as well. MTN is authorized to represent that three other parties that filed comments in response to the NPRM, The Boeing Company, PanAmSat Corporation and Stratos Offshore Services Company, support an extension of time in which to file reply comments. In addition, MTN has orally notified relevant Commission staff of the instant request.

According, MTN respectfully requests that the Commission grant the instant request and extend the time in which to file reply comments in this proceeding by 15 days, through and including March 24, 2004.

Respectfully submitted,

MARITIME TELECOMMUNICATIONS  
NETWORK, INC.

By:   
Raul R. Rodriguez  
Philip A. Bonomo

Leventhal Senter & Lerman PLLC  
2000 K Street, NW, Suite 600  
Washington, DC 20006  
(202) 429-8970

February 25, 2004

Its Attorneys